

Executive Summary

INTRODUCTION

The Pokagon Band of Potawatomi Indians (the Band), a federally-recognized tribe, submitted an application on May 14, 2012 with amendments on March 5, 2015, for the conveyance into trust of ±165.81 acres of land currently held by the Band in the City of South Bend, Indiana. The fee-to-trust application can be found in its entirety in **Appendix A**. The Band intends to develop a tribal village including 44 housing units, a multi-purpose facility, health services and other tribal government facilities. The proposed development for the property also includes a Class III gaming facility with a hotel, meeting space and a parking garage to generate revenues required to fund the tribal village and for the capital costs of the land that the Band acquired.

In 1994, Congress reaffirmed the Pokagon Band's status as a sovereign, federally-recognized Indian tribe by enactment of the Pokagon Restoration Act, 25 U.S.C. § 1300j *et seq.* ("Restoration Act"). Section 5 of the Restoration Act mandates that the Secretary of the Interior ("Secretary") acquire land in trust to be held in trust for the benefit of the Band ("trust land") and become part of the Band's reservation. Section 7 of the Restoration Act established a 10-county service area for the Band for the Michigan counties of Allegan, Berrien, Van Buren, and Cass, and the Indiana counties of La Porte, St. Joseph, Elkhart, Starke, Marshall, and Kosciusko ("Service Area"). In 1999, the Band and the Department entered into a Memorandum of Understanding ("MOU") that established the geographic areas within which the Band will acquire fee land to submit to the Secretary for acquisition. The Band is to concentrate its land holdings in four geographic areas in the vicinity of Dowagiac, Michigan; New Buffalo, Michigan; Hartford, Michigan; and South Bend, Indiana. Land in the three consolidation sites in Michigan has already been acquired in trust by the United States. This application is for the fourth consolidation site in South Bend.

PURPOSE AND NEED

The purpose of acquiring the consolidation site in South Bend in trust is to establish an inalienable tribal land base for the benefit of the Band's citizens residing in northern Indiana. The purpose of the acquisition is to provide housing, community space, and governmental services to Band citizens and to create permanent jobs and to generate revenue necessary to assure a stable economic future for the benefit of Band citizens. The Pokagon Band engaged in a master planning process for the South Bend Site, which involved data and information gathering, analysis, the development of options and proposals, and citizen input throughout the process through surveys, public meetings, and other forms of communication. The master planning process produced a comprehensive land use plan that creates a framework to guide development in a manner that will best address the needs and goals of Pokagon Band (also see Section 3.7.3 for additional master planning details). The trust acquisition meets four needs identified by the Band during the master planning process,

including: an increased tribal land base in Indiana to provide housing and community services to the local residents, the need for a community focused space, the need for a central location to administer government services to the Band's Indiana community and the need for a commercial development that would provide employment opportunities and economic stability in support of the Band's Indiana residents.

ENVIRONMENTAL IMPACT STATEMENT (EIS) METHODOLOGY

The EIS analysis includes an assessment of the environmental, social, and economic impacts of the preferred alternative and reasonable alternatives. The methodology employed by the BIA can be briefly summarized as follows:

- Statement of Purpose and Need. See Section 1.1.
- Identify a broad range of potential alternatives to the Proposed Action. See Section 2.3-2.6.
- Determine a range of reasonable alternatives and eliminate alternatives that do not meet the purpose and need or that are technically and economically impractical or infeasible. See Section 2.3-2.6.
- Identify the alternatives to be evaluated in detail in the EIS. See Section 2.3-2.6.
- Describe the Affected Environment. See Section 3.0.
- Evaluate the impacts (including direct, indirect and cumulative) of the Proposed Action, identify reasonable alternatives and the No-Action alternative. See Section 4.2 to Section 4.12.
- Establish objective criteria to determine the significance of impacts for each alternative. See Section 4.2 to Section 4.12.
- Develop potential mitigation measures. See Section 5.0.
- Compare reasonable alternatives. See Section Executive Summary (ES).
- Select the Preferred Alternative. See Section ES.

ALTERNATIVES

This document describes and analyzes three development alternatives and the No Action alternative for analytical comparison. Alternatives have been selected which meet the projects purpose and need. Alternative A is considered to most suitably meet these conditions and therefore has been selected as the Preferred Alternative. Alternative A is considered the preferred alternative for several key reasons;

1. The South Bend location is part of the South Bend Consolidation site. Pursuant to the Restoration Act and the MOU, the Band is continuing to reestablish its reservation homelands in consolidation sites located in the vicinity of Dowagiac, Michigan; New Buffalo, Michigan; Hartford, Michigan; and South Bend, Indiana.

2. The South Bend site is considered “restored lands” for the purposes of an exemption from Indian Gaming Regulatory Act’s (IGRA) general prohibition against gaming on lands acquired in trust after October 17, 1998. Lands located within a consolidation site when taken into trust for the Band pursuant to the Pokagon Restoration Act are considered “restored lands” for the purposes of an exemption from the Indian Gaming Regulatory Act’s (IGRA) general prohibition against gaming on lands acquired in trust after October 17, 1988.
3. The South Bend site would establish an inalienable land base of ±165.81 acres of trust land necessary to meet tribal needs in Indiana. There are no current plans to put the Elkhart site into trust.
4. The Tribal village will meet the needs of the Band members residing in the State of Indiana by providing quality housing and community services currently not available.
5. The casino will provide necessary employment opportunities and revenue to the Band members needed to ensure a stable economic future for the band. Section 4.7 provides more specific details which conclude that the South Bend property is more economically beneficial than the Elkhart property and that the development of a casino provides a much larger revenue stream than the other proposed commercial development.

The alternatives are described in Section 2.0 of the EIS and are summarized below.

Alternative A – South Bend Site Tribal Village and Casino (Preferred Alternative)

Alternative A includes the development of a tribal village including; single family housing, duplex housing, apartments and a community center with meeting rooms, a community room, administrative offices for community gathering, educational facilities, governmental offices and health services. The single family dwellings would include an attached garage, and the apartments would have detached garages. Alternative A also includes a Class III gaming facility including; gaming and hotel facilities, food and beverage facilities, administration facilities to support the Casino operations, conference facilities, small retail, and office space. Alternative A is sited on the South Bend property located in the northwestern portion of the State of Indiana, within the municipal limits of the City of South Bend.

Alternative B – Elkhart Site Tribal Village and Casino

Alternative B is similar in scope to Alternative A, it also includes the development of a tribal village including; single family housing, duplex housing, apartments and a community center with meeting rooms, a community room, administrative offices for community gathering, educational facilities, governmental offices and health services. Each home will range from two to three bedrooms with attached garages and each apartment will range from two to three bedrooms with detached garages. Alternative B also includes a Class III gaming facility including; gaming and hotel facilities, food and beverage facilities, administration facilities to support the Casino operations, conference facilities, small retail, and office space. Alternative B is located within Elkhart County in

the northwest portion of Indiana. The Elkhart site is bordered to the north by County Road 26 and State Road 19 to the west.

Alternative C – South Bend Site Tribal Village With Commercial Development

Alternative C includes the development of a tribal village including; single family housing, duplex housing, apartments and a community center with meeting rooms, a community room, administrative offices for community gathering, educational facilities, governmental offices and health services. Each home will range from two to three bedrooms with attached garages and each apartment will range from two to three bedrooms with detached garages. Alternative C also includes the development of a travel plaza, family entertainment center and strip shopping center. Alternative C is located on the South Bend site described in Alternative A.

Alternative D – No Action

Under the No-action Alternative D, neither the South Bend site nor the Elkhart site will be developed as described above in Alternatives A, B, and C. Under Alternative D, the Band will be unable to proceed with plans to fulfill its governmental responsibilities to its citizens residing in northern Indiana.

ENVIRONMENTAL CONSEQUENCES AND SUMMARY MATRIX

Major Conclusions

The major conclusions of the environmental consequences assessment are that all three of the development alternatives would have socioeconomic benefits for the Pokagon Band in direct response to the Band's purpose and need described in Chapter 1 and Section 3.7.3 of the EIS. Among the development alternatives, the Preferred Alternative has the greatest beneficial contributions to the socioeconomic purpose and need and environmental justice concerns. It would generate more net revenues than the other two alternatives to fund the tribal village and government services that the Band would provide in the village to its citizens. The No Action Alternative would have significant unacceptable adverse socioeconomic and environmental justice impacts to the Band. All three development alternatives have similar impacts to land, water, air and living resources. With mitigation, the three development alternatives would have fairly similar and not significant impacts to public services, resource use patterns and cumulative effects. The following table compares these impacts graphically.

Table of Environmental Consequences

The environmental consequences of the alternatives analyzed within the EIS are summarized in Table ES-1. Mitigation measures have been identified, where feasible, to address specific effects regardless of whether they are considered "significant". Mitigation measures identified in the

design process have been incorporated into the project description. In addition, measures have been identified to mitigate specific effects identified during the preparation of the EIS. These measures are summarized in Table ES-1 below. For a detailed discussion of environmental consequences, please see Section 4.0 of this document.

The following abbreviations have been used in Table ES-1 to identify the alternatives:

- AA – Alternative A-South Bend Tribal Village and Casino- Preferred Alternative
- AB – Alternative B-Elkhart Site Tribal Village and Casino
- AC – Alternative C-South Bend Tribal Village with Commercial Development
- AD – No Action Alternative

The following abbreviations have been used to identify the level of significance:

- LTS – Less than Significant
- S – Significant
- NE – No Effect
- BE – Beneficial Effect
- N/A – Not Applicable

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Table ES-1. Summary of Potential Environmental Effects, Mitigation Measures, and Significance

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
0.2	LAND RESOURCE				
	AA	Clearing and grading 78.79 acres of the currently variable surface. Smoothing of hilly contours to accommodate the proposed construction. Excavation and fill to establish adequate foundation for development features	No	LTS	N/A
	AB	Clearing and grading 87.86 acres of the current relatively flat surface to accommodate the proposed construction elements	No	LTS	N/A
	AC	Clearing and grading 41.87 acres of the surface area to accommodate the proposed construction elements	No	LTS	N/A
	AD	No Clearing or grading	No	NE	N/A
0.3	WATER RESOURCES-Drainage and Surface Water Quality				
	AA	Create approximately 34 acres of new impervious surface on the project site	No	LTS	Vegetated swales and detention ponds to treat storm water on-site.
	AA	Surface Water Quality effects during construction and operation phase	No	LTS	Best Management Practices incorporated into the Stormwater Pollution Prevention Plan
	AB	Create approximately 37 acres of new impervious surface on the project site	No	LTS	Vegetated swales and detention ponds to treat storm water on-site.
	AB	Surface Water Quality effects during construction and operation phase	No	LTS	Best Management Practices incorporated into the Stormwater Pollution Prevention Plan
	AC	Create approximately 14 acres of new impervious surface on the project site	No	LTS	Vegetated swales and detention ponds to treat storm water on-site.

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AC	Surface Water Quality effects during construction and operation phase	No	LTS	Best Management Practices incorporated into the Stormwater Pollution Prevention Plan
	AD	None	No	NE	N/A
0.3	Groundwater				
	AA	Groundwater Contamination from accidental spills during construction or operation	No	LTS	Spill Prevention, Control, and Countermeasures Plan
	AB	Groundwater Contamination from accidental spills during construction or operation	No	LTS	Spill Prevention, Control, and Countermeasures Plan
	AC	Groundwater Contamination from accidental spills during construction or operation	No	LTS	Spill Prevention, Control, and Countermeasures Plan
	AD	None	No	NE	N/A
0.4	AIR QUALITY				
	AA	Construction activities emissions: VOC, NO _x , CO, SO _x , PM ₁₀ , and PM _{2.5}	No	LTS	Maintain vehicles in good condition, restrict vehicle idling, implement dust suppression methods
	AA	Area and vehicle source emissions during operation	No	LTS	Use of energy efficient equipment and construction methods, increased building insulation; and restriction of vehicle idling limits
	AA	Increase in greenhouse gas emissions or global climate change, as outlined in the Council on Environmental Quality (CEQ) Memorandum On the Consideration of Greenhouse Gas ("GHG") Emissions and Climate Change (2010).	No	LTS	Built to 2012 International Building Code requirements for energy conservation that would help minimize energy costs and thereby contribute to the goal of reducing GHG emissions

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AB	Construction activities emissions: VOC, NO _x , CO, SO _x , PM ₁₀ , and PM _{2.5}	No	LTS	Maintain vehicles in good condition, restrict vehicle idling, implement dust suppression methods
	AB	Area and vehicle source emissions during operation	No	LTS	Use of energy efficient equipment and construction methods, increased building insulation; and restriction of vehicle idling limits
	AB	Increase in greenhouse gas emissions or global climate change	No	LTS	Built to 2012 International Building Code requirements for energy conservation that would help minimize energy costs and thereby contribute to the goal of reducing GHG emissions
	AC	Construction activities emissions: VOC, NO _x , CO, SO _x , PM ₁₀ , and PM _{2.5}	No	LTS	Maintain vehicles in good condition, restrict vehicle idling, implement dust suppression methods
	AC	Area and vehicle source emissions during operation	No	LTS	Use of energy efficient equipment and construction methods, increased building insulation; and restriction of vehicle idling limits
	AC	Increase in greenhouse gas emissions or global climate change	No	LTS	Built to 2012 International Building Code requirements for energy conservation that would help minimize energy costs and thereby contribute to the goal of reducing GHG emissions
	AD	None	No	NE	N/A
0.5	BIOLOGICAL RESOURCES - Wildlife and Habitats				

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AA	Loss of foraging and breeding habitats for resident and migratory wildlife species and the permanent displacement of some wildlife to other onsite and offsite habitats.	No	LTS	Survey of wildlife before construction. Loss of habitat will not significantly alter species composition
	AA	Increased wildlife mortality from construction vehicles and increases vehicles during operation	No	LTS	Reduce speed limits, limit construction to daylight hours
	AA	Creation of 5.52 acres of detention ponds resulting increased habitat	No	BE	N/A
	AB	Increased wildlife mortality from construction vehicles and increases vehicles during operation	No	LTS	Reduce speed limits, limit construction to daylight hours. Loss of habitat will not significantly alter species composition
	AB	Creation of 7.20 acres of detention ponds resulting increased habitat	No	BE	N/A
	AB	Increase in foraging and breeding habitats for wildlife with the establishment of 86 acres of native prairie landscape	No	BE	N/A
	AC	Loss of foraging and breeding habitats for resident and migratory wildlife species and the permanent displacement of some wildlife to other onsite and offsite habitats.	No	LTS	Survey of wildlife before construction. Loss of habitat will not significantly alter species composition
	AC	Increased wildlife mortality from construction vehicles and increases vehicles during operation	No	LTS	Reduce speed limits, limit construction to daylight hours
	AC	Creation of 6.85 acres of detention ponds resulting increased habitat	No	BE	N/A
	AD	None	No	NE	N/A
0.5	Federally Listed Species				
	AA	Effects on Federally listed species	No	NE	No disturbance of protected species without permit or other authorization from the U.S. Fish and Wildlife Service (USFWS)

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AB	Effects on Federally listed species	No	NE	No disturbance of protected species without permit or other authorization from the U.S. Fish and Wildlife Service
	AC	Effects on Federally listed species	No	NE	No disturbance of protected species without permit or other authorization from the U.S. Fish and Wildlife Service
	AD	None	No	NE	N/A
0.5	Vegetation				
	AA	Loss of approximately 78.9 acres of existing vegetative community (old field, Eurasian meadow, shrub/tree, and fence row trees/shrub)	No	LTS	N/A
	AB	Creation of approximately 86 acres of native prairie	No	BE	N/A
	AC	Loss of approximately 42.6 acres of existing vegetative community (old field, Eurasian meadow, shrub/tree, and fence row trees/shrub)	No	LTS	N/A
	AD	None	No	NE	N/A
0.5	Wetlands				
	AA	Approximate impacts include: 0.96 acre forested wetland, 0.71 acre emergent wetland and 0.67 acre (3,300 linear feet) riverine wetlands	No	LTS	Regulated by the USACE. USACE wetland mitigation ratios are typically four acres of forested wetland for each acre of forested wetland impacted, two acres of emergent wetland for each acre of emergent wetland impacted and relocation or restoration of stream channels at a minimum ratio of one foot for each foot impacted. Stormwater BMPs implemented

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AB	Potentially 13 acres of wetland impacts if the farmland was allowed to return to its historical condition	No	LTS	Regulated by the USACE. USACE wetland mitigation ratios are typically four acres of forested wetland for each acre of forested wetland impacted, two acres of emergent wetland for each acre of emergent wetland impacted and relocation or restoration of stream channels at a minimum ratio of one foot for each foot impacted. Stormwater BMPs implemented
	AC	Approximate impacts include: 0.19 acre forested wetland, 0.62 acre emergent wetland and 0.46 acre (2,000 linear feet) riverine wetlands.	No	LTS	Regulated by the USACE. USACE wetland mitigation ratios are typically four acres of forested wetland for each acre of forested wetland impacted, two acres of emergent wetland for each acre of emergent wetland impacted and relocation or restoration of stream channels at a minimum ratio of one foot for each foot impacted. Stormwater BMPs implemented
	AD	None	No	NE	N/A
0.6		CULTURAL RESOURCES			
	AA	Adverse effects on cultural resources	No	LTS	None at this time. Future impacts may require compliance with Sections 106 and possibly 110 of the NHPA, including mitigation.
	AB	Adverse effects on cultural resources	No	NE	N/A

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AC	Adverse effects on cultural resources	No	LTS	None at this time. Future impacts may require compliance with Sections 106 and possibly 110 of the NHPA, including mitigation.
	AD	Adverse effects on cultural resources	No	N/A	N/A
0.7		SOCIOECONOMIC RESOURCES			
	AA	Construction spending (Direct, Indirect, Induced)	No	BE	N/A
	AA	Increased employment (Direct, Indirect, Induced)	No	BE	N/A
	AA	Creation of inalienable land base for tribal village with 44 housing units, community center with increased tribal government services for Band citizens	Yes, Better than the other 2 Alternatives	BE	N/A
	AA	Increase in number of school age children	No	LTS	Insignificant impact on area school load
	AA	Increase in use of libraries and parks	No	LTS	Insignificant impact on area library and park capacity
	AA	Potential social costs from gambling addiction and other problem gambling behavior	No	LTS	Implementation of existing Band law, regulation, and practices related to problem gambling
	AA	Loss of state tax base by transferring land to Band fee-to-trust holding	No	LTS	“Local Agreement” between the Pokagon Band of Potawatomi Indians and the City of South Bend dated April 11, 2016 was approved by City Common Council Resolution No. 4554-16. Section 14 of the Agreement obligates the Pokagon Band to make annual payments “in-lieu-of-taxes” to the City with minimum guaranteed amounts of either \$1 Million or \$2 Million, depending on the size of the

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
					gaming facility the Band has the ability and legal right to operate.
	AA	Increase in indirect sales and related tax revenue	No	BE	N/A
	AA	Increase in demand on local government services	No	LTS	Various state and/or local agreements (e.g., compacts) may be negotiated where the Band shares costs to offset increased governmental services
	AB	Construction spending (Direct, Indirect, Induced)	No	BE	N/A
	AB	Increased employment (Direct, Indirect, Induced)	Yes	BE	N/A
	AB	Creation of inalienable land base for tribal village with 44 housing units, community center with increased tribal government services for Band citizens;	Yes, but to a lesser extent than Preferred Alternative	BE	N/A
	AB	Increase in number of school age children	No	LTS	Insignificant impact on area school load
	AB	Increase in use of libraries and parks	No	LTS	Insignificant impact on area library and park capacity
	AB	Potential social costs from gambling addiction and other problem gambling behavior	No	LTS	Implementation of existing Band law, regulation, and practices related to problem gambling
	AB	Loss of state tax base by transferring land to Band fee-to-trust holding	No	LTS	Various state and/or local agreements (e.g., compacts) may be negotiated where the Band shares costs to offset increased governmental services
	AB	Increase in indirect sales and related tax revenue	No	BE	N/A

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AB	Increase in demand on local government services	No	LTS	Various state and/or local agreements (e.g., compacts) may be negotiated where the Band shares costs to offset increased governmental services
	AC	Construction spending (Direct, Indirect, Induced)	No	BE	N/A
	AC	Increased employment (Direct, Indirect, Induced)	Yes	BE	N/A
	AC	Creation of inalienable land base for tribal village with 44 housing units, community center with increased tribal government services for Band citizens	Yes, but to a lesser extent than Preferred Alternative	BE	N/A
	AC	Increase in number of school age children	No	LTS	Insignificant impact on area school load
	AC	Increase in use of libraries and parks	No	LTS	Insignificant impact on area library and park capacity
	AC	Loss of state tax base by transferring land to Band fee-to-trust holding	No	LTS	N/A
	AC	Increase in indirect sales and related tax revenue	No	BE	N/A
	AC	increase in demand on local government services	No	LTS	N/A
	AD		Would result in significant adverse impact due to lost opportunity to contribute to purpose & need;	NE	N/A

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
0.8		RESOURCE USE PATTERNS			
	AA	Anticipated congestion on US 31/20 East and Westbound Ramps, SR-23 between US 31/20 Westbound Ramp and New Energy Drive, New Energy Drive at SR-23, Locust Road at SR-23, and Ewing Avenue at SR-23	No	S	Install traffic signals and turn lanes at intersections, increase the number of travel lanes where necessary
	AA	Land use related impacts	No	LTS	Transfer of land use jurisdiction to the Band. Proposed uses comply with Band law and regulation. No conflict with past and current land use plans
	AA	Loss of Prime and Unique Farmlands	No	LTS	NRCS has reviewed and no further steps are required
	AB	Anticipated congestion on County Road 28 at SR-19, SR-19 at Proposed Driveway A (Main Casino Driveway), US 20 Westbound Ramps,	No	S	Install traffic signals and turn lanes at intersections, increase the number of travel lanes where necessary
	AB	Land use related impacts	No	LTS	Transfer of land use jurisdiction to the Band. Proposed uses comply with Band law and regulation. No conflict with past and current land use plans
	AB	Loss of Prime Farmlands	No	LTS	NRCS has reviewed and no further steps are required
	AC	Anticipated congestion on US 31/20 East and Westbound Ramps, SR-23 and Driveway B, New Energy Drive at SR-23, Ewing Avenue at SR-23	No	S	Install traffic signals and turn lanes at intersections, increase the number of travel lanes where necessary

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AC	Land use related impacts	No	LTS	Transfer of land use jurisdiction to the Band. Proposed uses comply with Band law and regulation. No conflict with past and current land use plans
	AC	Loss of Prime and Unique Farmlands	No	LTS	NRCS has reviewed and no further steps are required
	AD	None	No	NE	N/A
0.9		PUBLIC SERVICES			
	AA	Increased demand for drinking and fire protection water	No	LTS	A new water main (approximately 10,500 feet long) would connect to the City of South Bend's existing 12-inch water main service on Locust Road.
	AA	Wastewater collection and treatment by the City of South Bend	No	LTS	A lift station would be located on-site and a forced main would extend approximately 3,500 feet to connect to an existing manhole on Locust Road.
	AA	Collection and disposal of solid waste	No	LTS	Recycling and composting programs. Trash compactor or streamline compactor could be utilized to reduce the volume of trash being produced
	AA	Increased demand for electricity and natural gas	No	LTS	Local utilities are able to meet project demand. Generators will be located on site for emergency use
	AA	Increased demand for telecommunications	No	LTS	Fiber optic and copper cable will be installed and connected to development site by local providers

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AA	Increased demand for Law Enforcement	No	LTS	The St. Joseph County Board of Commissioners unanimously adopted Resolution R-12-C-2014 which approved the local governmental cross deputization agreement for law enforcement with the Pokagon Band of Potawatomi Indians. The Band would provide on-site security at casino
	AA	Increased demand for fire protection services	No	LTS	Band will comply with all building code and fire protection regulations
	AB	Increased demand for drinking and fire protection water	No	LTS	A new water main (approximately 8,000 feet) would connect to the City of Elkhart's existing water main on County Road 26. An additional 6,700 feet of water main would be constructed along Nappanee Street from County Road 26 extending north to the existing water main approximately 1,500 feet south of County Road 24, where a booster station would be constructed.
	AB	Wastewater collection and treatment by the City of Elkhart	No	LTS	Approximately 12,500 feet of new sewer line would be needed. A lift station would be located on-site and a forced main would extend approximately 12,500 feet to connect to an existing manhole on West Mishawaka Road (County Road 20).

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AB	Collection and disposal of solid waste	No	LTS	Recycling and composting programs. Band would enter into a service contract with a private disposal company
	AB	Increased demand for electricity and natural gas	No	LTS	Local utilities are able to meet project demand. Generators will be located on site for emergency use
	AB	Increased demand for telecommunications	No	LTS	Fiber optic and copper cable will be installed and connected to development site by local providers
	AB	Increased demand for Law Enforcement	No	LTS	Agreement between Band and local government will be made for police service. The Band would provide on-site security at casino
	AB	Increased demand for fire protection services	No	LTS	Band will comply with all building code and fire protection regulations
	AC	Increased demand for drinking and fire protection water	No	LTS	A new water main (approximately 10,000 feet long) would connect to the City of South Bend's existing 12-inch water main service on Locust Road.
	AC	Wastewater collection and treatment by the City of South Bend	No	LTS	A lift station would be located on-site and a forced main would extend approximately 2,200 feet to an existing manhole on Locust Road.
	AC	Collection and disposal of solid waste	No	LTS	Recycling and composting programs. Trash compactor or streamline compactor could be utilized to reduce the volume of trash being produced

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AC	Increased demand for electricity and natural gas	No	LTS	Local utilities are able to meet project demand. Generators will be located on site for emergency use
	AC	Increased demand for telecommunications	No	LTS	Fiber optic and copper cable will be installed and connected to development site by local providers
	AC	Increased demand for Law Enforcement	No	LTS	The St. Joseph County Board of Commissioners unanimously adopted Resolution R-12-C-2014 which approved the local governmental cross deputization agreement for law enforcement with the Pokagon Band of Potawatomi Indians.
	AC	Increased demand for fire protection services	No	LTS	Band will comply with all building code and fire protection regulations
	AD	None	No	NE	N/A
0.10		OTHER VALUES			
	AA	Construction noise generated at the site	No	LTS	Construction hours would be limited outside of a standard workday. Equipment would be shut down when not in use
	AA	Traffic noise generated at the site	No	LTS	Reduce idling allowances for busses and trucks. Predicted noise levels are below the criteria set forth in the St. Joseph County noise ordinance
	AA	Ambient noise generated at the site	No	LTS	Predicted noise levels are below the criteria set forth in the St. Joseph County noise ordinance

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AA	Hazardous material at the site	No	LTS	Emergency Operation Plan will be implemented in compliance with Band law
	AA	Increased light sources	No	LTS	Reduce light spillover in building and signage design. Some reduction from existing vegetation
	AA	Landscaping with adaptive and native vegetation to blend with existing vegetation	No	BE	N/A
	AB	Construction noise generated at the site	No	LTS	Construction hours would be limited outside of a standard workday. Equipment would be shut down when not in use
	AB	Traffic noise generated at the site	No	LTS	Reduce idling allowances for busses and trucks. Predicted noise levels are below the criteria set forth in the St. Joseph County noise ordinance
	AB	Ambient noise generated at the site	No	LTS	Predicted noise levels are below the criteria set forth in the Elkhart noise ordinance
	AB	Hazardous material at the site	No	LTS	Emergency Operation Plan will be implemented in compliance with Band law
	AB	Increased light sources	No	LTS	Reduce light spillover in building and signage design. Some reduction from existing vegetation
	AB	Landscaping with adaptive and native vegetation to blend with existing vegetation	No	BE	N/A

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
	AC	Construction noise generated at the site	No	LTS	Construction hours would be limited outside of a standard workday. Equipment would be shut down when not in use
	AC	Traffic noise generated at the site	No	LTS	Reduce idling allowances for busses and trucks. Predicted noise levels are below the criteria set forth in the St. Joseph County noise ordinance
	AC	Ambient noise generated at the site	No	LTS	Predicted noise levels are below the criteria set forth in the St. Joseph County noise ordinance
	AC	Hazardous material at the site	No	LTS	Emergency Operation Plan will be implemented in compliance with Band law
	AC	Increased light sources	No	LTS	Reduce light spillover in building and signage design. Some reduction from existing vegetation
	AC	Landscaping with adaptive and native vegetation to blend with existing vegetation	No	BE	N/A
	AD	None	No	NE	N/A
0.11		ENVIRONMENTAL JUSTICE			
	AA	Creation of an inalienable land base in Indiana for the Band	Yes	BE	N/A
	AA	Job creation for Band members and non-tribal South Bend residents	Yes	BE	N/A
	AA	Creation of 44 housing units for Band member residences, community center for Band to provide government services to its Citizens; Generate revenues to fund tribal village;	Yes, to a greater extent than the other	BE	N/A

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
			alternatives		
	AA	Revenue spent on services and supply in the state and local vicinity	No	BE	N/A
	AA	Effects of potential increase in alcoholism, problem gambling and related domestic and fiscal issues	No	LTS	Band has adopted responsible alcohol beverage policy. Other potential offsets include increased employment opportunities, enhanced government revenue, and enhanced public services
	AB	Creation of an inalienable land base in Indiana for the Band	Yes	BE	N/A
	AB	Job creation for Band members and non-tribal South Bend residents	Yes	BE	N/A
	AB	Creation of 44 housing units for Band member residences community center for Band to provide government services to its Citizens; Generate revenues to fund tribal village;	Yes, but to a lesser extent than Preferred Alternative	BE	N/A
	AB	Revenue spent on services and supply in the state and local vicinity	No	BE	N/A
	AB	Effects of potential increase in alcoholism, problem gambling and related domestic and fiscal issues	No	LTS	Band has adopted responsible alcohol beverage policy. Other potential offsets include increased employment opportunities, enhanced government revenue, and enhanced public services
	AC	Job creation for Band members and non-tribal South Bend residents	Yes	BE	N/A
	AC	Creation of an inalienable land base in Indiana for the Band; Creation of 44 housing units for Band member residences	Yes, but to a lesser extent	BE	N/A

Table ES-1, continued

EIS Sub-section	Alternative	Environmental Effects	Is the Effect Key to the Purpose & Need?	Level of significance before mitigation	Mitigation Measures
		community center for Band to provide government services to its Citizens; Generate revenues to fund tribal village;	than Preferred Alternative		
	AC	Revenue spent on services and supply in the state and local vicinity	No	BE	N/A
	AC	Potential increase in alcoholism resulting from sale at expected travel center and gas station	No	LTS	Band has adopted responsible alcohol beverage policy
	AD		Would result in significant adverse impact due to lost opportunity to contribute to purpose & need	NE	N/A